

United States District Court
for the
Southern District of New York
Related Case Statement

Full Caption of Later Filed Case:

<p>Plaintiff</p> <p>AVANGRID NETWORKS, INC.; and AVANGRID SERVICE COMPANY</p> <p>vs.</p> <p>SECURITY LIMITS, INC., and PAULO SILVA</p>	<p>Case Number</p> <p>1:22-cv-09622</p>
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Defendant

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

<p>Plaintiff</p> <p>SECURITY LIMITS INC.,</p> <p>vs.</p> <p>AVANGRID NETWORKS, INC., AVANGRID, INC., IBERDROLA S.A., PROSEGUR GESTIÓN de ACTIVOS, S.L., UNLIMITED TECHNOLOGY, INC., CIPHER SECURITY, LLC, PROSEGUR SECURITY MONITORING, INC. f/k/a VIEWPOINT CRM, INC., BLACK & VEATCH CORPORATION, DAVID LATHROP, JOHN ALLEN, TOM FITZGERALD, ENRIQUE VICTOREO, ANTONIO ASENO MARTIN, ED BOUCAS, ANDRE VIERA ROLIM, BILL REILLY, and JOHN DOES 1 TO 100,</p>	<p>Case Number</p> <p>1:21-cv-10124-GHW</p>
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Defendant

Status of Earlier Filed Case:

- | | | |
|---------------------------------------|--------|--|
| <input checked="" type="checkbox"/> X | Closed | (If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.) |
| <input type="checkbox"/> | Open | (If so, set forth procedural status and summarize any court rulings.) |

Security Limits, Inc. filed its complaint, which was assigned to Judge Woods. It then voluntarily dismissed its complaint one day before the initial pre-trial conference before Judge Woods, but it has repeatedly indicated, including to the media, that it intends to refile substantially the same claims.

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

Both the earlier filed case and the newly filed case arise from same set of operative facts regarding Security Limits' work as a subcontractor for Avangrid Networks, Inc., which took place during a limited time period. The newly-filed case alleges that Defendants wrongfully accessed data that they had refused to return to Plaintiffs at the conclusion of their subcontract and included information derived therefrom in their complaint in the earlier-filed case.

Further, the newly filed case alleges that (i) the earlier-filed case was filed as part of an extortion scheme to extract contracts or money from Plaintiffs by threatening to make false statements, (ii) Defendants have (both directly and through their counsel) asserted that value of Defendants' supposed claims from the earlier filed case (that they have said they will refile) lies in avoiding adverse publicity or investigations (as opposed to any legal merit), and (iii) they have offered not to cooperate with investigators if they are paid off.

Signature:



Date: November 10, 2022

Firm:

Steptoe & Johnson LLP